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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DECLARATION OF MICHAEL J.
WILLIAMS REGARDING
INDIVIDUALIZED REASONING AND
DOCUMENTATION OF
PROBATIONARY TERMINATIONS**

1 I, Michael J. Williams, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am the Chief Human Capital Officer for the Department of Justice. I have
3 served in the Chief Human Capital Officer position since June 2023.

4 2. Pursuant to this court's September 12, 2025, Order on Cross-Motions for
5 Summary Judgment in the above-styled case, I hereby provide information regarding the
6 probationary terminations conducted by Department of Justice components from January 20,
7 2025, to October 31, 2025, the date of the request for information to components.

8 3. From January 20, 2025, to October 31, 2025, the Department of Justice
9 terminated 265 employees serving a probationary or trial period.

10 4. It was not necessary for DOJ to update any employee personnel files, including
11 electronic official personnel folders (eOPFs) and/or Standard Form 50s (SF-50s), to comply with
12 Paragraph 3 of the September 12, 2025, Order because DOJ did not terminate any employee
13 using the U.S. Office of Personnel Management's (OPM) February 2025 template nor was any
14 termination based in whole or in part on OPM's January 20, 2025, memo titled "Guidance on
15 Probationary Periods, Administrative Leave and Details."

16 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
17 and correct.

18 Dated: November 17, 2025

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23 MICHAEL J. WILLIAMS
24 CHIEF HUMAN CAPITAL OFFICER
25 DEPARTMENT OF JUSTICE
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